

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                                 |   |                              |
|---------------------------------|---|------------------------------|
| <b>IN RE:</b>                   | : | <b>Chapter 11</b>            |
| <b>JIGNESH PANDYA AND MITAL</b> | : |                              |
| <b>PANDYA</b>                   | : | <b>Case No. 23-13723-amc</b> |
|                                 | : |                              |
| <b>Debtors</b>                  | : |                              |

**NOTICE OF APPEARANCE OF KEVIN T. FOGERTY, ESQUIRE, ON BEHALF OF  
AMERICAN BANK, COMBINED WITH DEMAND FOR SERVICE OF PAPERS**

Please take notice that American Bank, a party-in-interest in the above-captioned case, hereby appears in the above-captioned case by its counsel, Kevin T. Fogerty; such counsel hereby enters his appearance pursuant to 11 U.S.C.A. § 101, et seq. (the "Bankruptcy Code") and Federal Rule of Bankruptcy Procedure 9010(b); and such counsel hereby requests, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017 and 9007 and §§342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the following address and telephone number:

Kevin T. Fogerty, Esquire  
Mill Run Office Center  
1275 Glenlivet Drive, Suite 150  
Allentown, PA 18106  
610-366-0950

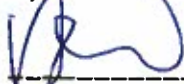
Please take further notice that, pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy procedure specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or

request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned case and all proceedings therein.

This Notice of Appearance and Demand for Notices and papers shall not be deemed or construed to be a waiver of American Bank's rights (1) to have final orders in noncore matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which American Bank is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments American Bank expressly reserves.

Respectfully submitted,

AMERICAN BANK  
by its counsel:



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Kevin T. Fogerty, Esquire

Mill Run Office Center  
1275 Glenlivet Drive, Suite 150  
Allentown, PA 18106  
Phone 610-366-0950  
Fax 610-366-0955  
E-Mail [kfogerty@fogertylaw.com](mailto:kfogerty@fogertylaw.com)  
PA Supreme Court I. D. No. 36667

Dated: December 21, 2023

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|                                 | : |                              |
| <b>Debtors</b>                  | : |                              |

**CERTIFICATE OF SERVICE**

I, Kevin T. Fogerty, Esquire, counsel for American Bank, a party-in-interest in this proceeding, hereby state and certify that on Thursday, December 21, 2023, I served by ECF electronic notification and First-Class Mail, a true and correct copy of this Notice of Appearance of Kevin T. Fogerty, Esquire, on Behalf of American Bank, Combined with Demand for Service of Papers, upon the following:

***VIA FIRST-CLASS MAIL***

Jignesh Pandya  
8 Woodland Road  
Newtown, PA 18940  
*Debtor*

***VIA FIRST-CLASS MAIL***

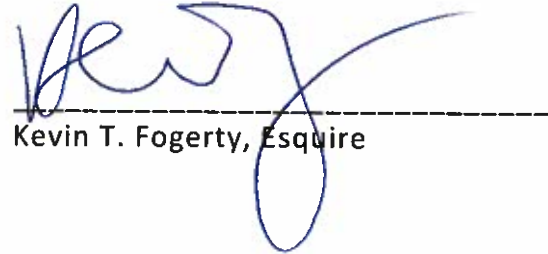
Mital Pandya  
8 Woodland Road  
Newtown, PA 18940  
*Debtor*

***VIA ECF NOTIFICATION***

Albert Anthony Ciardi, III, Esquire  
Ciardi Ciardi & Astin  
1905 Spruce Street  
Philadelphia, PA 19103  
*Counsel for Debtors*

**VIA FIRST-CLASS MAIL**  
United States Trustee  
Office of the U.S. Trustee  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101  
*U.S. Trustee*

Date: December 21, 2023



Kevin T. Fogerty, Esquire